

1 MELVIN R. GRIMES, ESQ.
2 Nevada Bar No: 12972
3 Melg@grimes-law.com
4 THE GRIMES LAW OFFICE
5 808 South 7th Street
Las Vegas, NV 89101
p: (702) 347-4357
f: (702) 224-2160
Attorney for Plaintiff

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 JAMES W. LESCINSKY
9 Plaintiff,

CASE NO:
2 :18-CV-01479-JAD-CWH

10 vs.

11 CLARK COUNTY SCHOOL DISTRICT, A
12 political subdivision of the State of Nevada, PAT
SKORKOWSKY, individually and in his official
capacity as Superintendent of Clark County School
District, TAMMY MALICH, individually and in
her capacity as Assistant Superintendent of Clark
County School District, MIKE BARTON,
individually and in his official capacity as Chief
Academic Officer of Clark County School District,
CLARK COUNTY SCHOOL DISTRICT
POLICE DEPARTMENT, A political subdivision
of the State of Nevada, JAMES KETSAA,
individually and in his capacity as Chief of Police
for Clark County School District Police
Department, CHRISTOPHER KLEMP,
individually and in his role as a Internal Affairs
Detective for Clark County School District Police
Department, KENNETH YOUNG, individually
and in his official capacity as a Police Captain for
the Clark County School District Police
Department, ROE and DOE SUPERVISORS, not
yet known,

Defendants.

STIPULATION AND ORDER TO
EXTEND TIME TO FILE PLAINTIFF'S
OPPOSITION TO DEFENDANT
CHRISTOPHER KLEMP'S SPECIAL
MOTION TO DISMISS PURSUANT TO
NRS 41.660 (NEVADA'S ANTI-SLAPP
STATUTE)

(Second Request)

25 COMES NOW Plaintiff, JAMES LESCINSKY, by and through his attorney of record
26 MELVIN R. GRIMES, ESQ. of THE GRIMES LAW OFFICE, and Defendant, CHRISTOPHER
27 KLEMP, by and through his Attorneys of Record, MARK E. FERRARIO, ESQ., KARA
28 HENDRICKS ESQ., and BETHANY L. RABE ESQ. of GREENBERG TRAURIG, and hereby

1 stipulate and make joint application to extend the time for Plaintiff to file an Opposition to
2 Defendant's Motion to Dismiss.

3 1. On November 9th 2018, the Defendant, Christopher Klemp, by and through his attorneys of
4 record, Mark E. Ferrario, Esq., Kara Hendricks Esq., And Bethany L. Rabe Esq. filed a Special
5 Motion to Dismiss Pursuant to NRS 41.660.

6 2. On November 15th 2018, Attorney Hendricks agreed to extend the due date for *Plaintiff's*
7 *Opposition to Plaintiff's Motion to Dismiss* to December 3rd 2018.

8 3. On November 20th 2018, Counsel filed the *Plaintiff's First Stipulation for Extension of Time*
9 *to File Plaintiff's Opposition to Defendant Christopher Klemp's Special Motion to Dismiss*.

10 4. On November 21st 2018, this Court entered an *Order Granting Plaintiff's First Stipulation for*
11 *Extension of Time to File Plaintiff's Opposition to Defendant Christopher Klemp's Special*
12 *Motion to Dismiss*, allowing Counsel until December 3rd 2018 to file the Plaintiff's Opposition.

13 5. On December 3rd 2018, the Parties met for an Early Neutral Evaluation Session before
14 Magistrate Judge Cam Ferenbach.

15 6. Counsel will be unable to complete *Plaintiff's Opposition to Defendant Christopher Klemp's*
16 *Special Motion to Dismiss* by the current due date, December 3rd 2018. Counsel requested by
17 e-mail to Mark E. Ferrario, Esq., Kara Hendricks Esq., And Bethany L. Rabe Esq. for a second
18 extension of time to file *Plaintiff's Opposition to Defendant Christopher Klemp's Special*
19 *Motion to Dismiss* on December 3, 2018.

20 7. On December 3rd, Attorney Kara Hendricks agreed to extend the due date for *Plaintiff's*
21 *Opposition to Plaintiff's Motion to Dismiss* to December 5th 2018.

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8. This is the Second request for enlargement of time and it is made in good faith and not for purposes of delay.

THE GRIMES LAW OFFICE

/s/ Melvin R. Grimes
Melvin R. Grimes, Esq.
Nevada Bar No.: 12972
808 S 7th Street
Las Vegas, NV 89101
Phone: (702)347-4357
Attorney for the Plaintiff

GREENBERG TRAURIG

s/ Kara Hendricks
Mark E. Ferrario, Esq.
Nevada Bar No.: 1625
Kara Hendricks, Esq.
Nevada Bar No.:7743
Bethany Rabe, Esq.
Nevada Bar No.: 11691
10845 Griffith Peak Drive Ste. 600
Las Vegas, NV 89135
Phone: (702) 792-3773
Attorneys for Christopher Klemp

ORDER

IT IS SO ORDERED this 4th day of December, 2018 that the parties' extension of time for the Plaintiff to file their Opposition to Defendant Christopher Kemp's Special Motion to Dismiss Pursuant to NRS 41.660 is hereby granted.

HON. JENNIFER DORSEY
United States District Judge

Respectfully Submitted by:
THE GRIMES LAW OFFICE

/s/ Melvin R. Grimes
Melvin R. Grimes, Esq.
Nevada Bar No.: 12972
808 S 7th Street
Las Vegas, NV 89101
Phone: (702)347-4357
Attorney for the Plaintiff